



Hannah Bernard

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To: Nancy Rumrill/R9/USEPA/US@EPA

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Subject: (UIC) permit for the Lahaina Wastewater

<<http://wildhawaii.org/>>

Hawai'i Wildlife Fund

September 22, 2008

Nancy Rumrill
EPA Region 9 Office
Ground Water Office (WTR-9)
75 Hawthorne Street
San Francisco, CA 94105

Re: Intent to issue an Underground injection control (UIC) permit for the Lahaina Wastewater Reclamation Facility, Lahaina, Maui

Dear Dr. Rumrill,

I am writing on behalf of Hawai'i Wildlife Fund to thank you in advance for holding a public hearing here on Maui next month regarding the injection well permit for Lahaina; I have heard that you intend to do so. During the last several years, several of our community groups (Maui Reef Fund, Maui Nui Marine Resource Council) have been participating in educational forums where the degradation of our nearshore reef ecosystem is the focus. Many of us are alarmed to see that there is a correlation between injection wells for treated wastewater and superabundant algae blooms (Status of Maui's Coral Reefs, DLNR/DAR and CRAMP long-term research project).

In addition, we are concerned that the Lahaina treated wastewater is not fully irradiated with UV and that nearshore waters have the highest stable isotope ratios ($\delta^{15}\text{N}\text{‰}$) in algal tissues recorded in the scientific literature (unpubl. data, Meghan Dailer, Celia Smith, UH). As you know, this is indicative of animal waste (presumably sewage) as a primary source. This information, coupled with the significant rise in human hospitalizations due to staph. infections during the last decade is alarming. Not only are the nearshore waters of Maui being polluted with excess nutrients which cause invasive algae blooms, they are also likely receiving and incubating such human pathogens as *Staphylococcus* spp. and viruses from the treated wastewater.

We look forward to the opportunity to meet with yourself and other EPA officials to discuss ways in which we can re-use the treated wastewater instead of injecting it (for irrigation of agriculture, to create greenbelts for fire prevention/retardation, etc.); your involvement and assistance to the County of Maui in obtaining funding (such as low interest loans, etc.) to modify our current wastewater treatment systems; and your assistance in ensuring that if wastewater is injected that it be UV irradiated and that it be de-nitrified and that the wells terminate thousands of feet deeper, if possible.

These conditions and concerns likely require the modification of the UIC permit for Lahaina's Wastewater Reclamation Facility. If so, we urge the EPA to do so to fulfill its jurisdiction and responsibility to "...maintain the chemical, physical, and biological integrity of the Nation's waters." 33 U.S.C. § 1251(a) under the Clean Water Act.

Sincerely,

Hannah Bernard
Hannah Bernard
President
Hawai'i Wildlife Fund